

1 **Marquis Aurbach Coffing**
Terry A. Coffing, Esq.
2 Nevada Bar No. 4949
Chad F. Clement, Esq.
3 Nevada Bar No. 12192
Jared M. Moser, Esq.
4 Nevada Bar No. 13003
10001 Park Run Drive
5 Las Vegas, Nevada 89145
Telephone: (702) 382-0711
6 Facsimile: (702) 382-5816
tcoffing@maclaw.com
7 cclement@maclaw.com
jmoser@maclaw.com
8 *Attorneys for Defendants*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN CARTER and CHRISTINE CARTER, Case No.: 2:16-cv-02967-RFB-VCF

Plaintiffs,

vs.

14 RICHLAND HOLDINGS, INC. d/b/a
ACCTCORP OF SOUTHERN NEVADA, a
15 Nevada Corporation; RC WILLEY aka RC
WILLEY FINANCIAL SERVICES, and
16 RANDALL CORPORATION d/b/a BOWEN
LAW OFFICES,

Defendants.

STIPULATION AND ORDER
DIRECTING EXPERIAN
INFORMATION SOLUTIONS, INC.,
EQUIFAX, AND TRANSUNION TO
PRODUCE PLAINTIFFS JOHN
CARTER'S AND CHRISTINE
CARTER'S CREDIT INFORMATION

19 Plaintiffs John Carter and Christine Carter ("Plaintiffs") and Defendant Richland
20 Holdings, Inc. d/b/a AcctCorp of Southern Nevada ("AcctCorp"), by and through their respective
21 counsel of record, hereby stipulate and jointly move the Court, pursuant to 15 U.S.C.
22 § 1681b(a)(1), for an Order directing Experian Information Solutions, Inc. ("Experian"),
23 Equifax, and TransUnion (collectively, "the CRAs") to produce any and all documents in the
24 CRAs' possession, custody, and control that are responsive to AcctCorp's October 10, 2018
25 Subpoenas to Produce Documents, Information, or Objects or to Permit Inspection of Premises
26 in a Civil Action ("Subpoenas").

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1 AcctCorp and Plaintiffs hereby agree and stipulate that each shall cooperate, to the extent
2 necessary, in order to provide counsel for AcctCorp with additional information that the CRAs
3 may reasonably request in order to produce the requested documents.

4 The CRAs shall produce to counsel for AcctCorp, within fourteen (14) calendar days
5 from the date of service of the Court's corresponding Order hereto, all documents within its
6 possession, custody, and control responsive to AcctCorp's Subpoenas, including, but not
7 necessarily limited to, the following categories of documents identified in the Subpoenas:

- 8 1. A comprehensive and detailed credit report for Plaintiffs, the scope of which shall
9 cover the time period from January 1, 2014, to present;
- 10 2. A comprehensive and detailed credit report (or other summary, graph, chart,
11 compilation, etc., of the credit reports) for John Carter and Christine Carter,
12 respectively, from January 1, 2014, to present, that identifies their credit score as it
13 changed from time to time, with sufficient detail to be able to identify the changed
14 credit score, when it changed, and why it changed; and
- 15 3. Any and all records relating to any deletion, removal, or other termination by
16 Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada of any negative
17 reference reported on John Carter's and Christine Carter's respective credit reports.

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MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 Additionally, the CRAs are directed to participate in depositions of their respective FRCP
2 30(b)(6) designee(s) as provided in the respective Subpoenas to Testify at a Deposition in a Civil
3 Action served by AcctCorp upon each of the CRAs.

4 Dated this 2nd day of November, 2018.

5 MARQUIS AURBACH COFFING

THE LAW OFFICE OF VERNON NELSON,
PLLC

6 By: /s/ Jared M. Moser
7 Terry A. Coffing, Esq.
Nevada Bar No. 4949
8 Chad F. Clement, Esq.
Nevada Bar No. 12192
9 Jared M. Moser, Esq.
Nevada Bar No. 13003
10 10001 Park Run Drive
Las Vegas, Nevada 89145
11 Telephone: (702) 382-0711
Facsimile: (702) 382-5816
12 tcoffing@maclaw.com
cclement@maclaw.com
13 jmoser@maclaw.com
14 *Attorneys for Defendants*

By: /s/ Vernon Nelson
Vernon Nelson, Esq.
Nevada Bar No.: 6434
9480 South Eastern Avenue, Suite 252
Las Vegas, NV 89123
702-476-2500
Fax 702-475-2788
vnelson@nelsonlawfirmnv.com
Attorney for Plaintiffs

15 **ORDER**

16 IT IS SO ORDERED this 9th day of November, 2018.

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18 UNITED STATES JUDGE